

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
Caption in Compliance with D.N.J. LBR 9004-1(b)**

In re:  
BLOCKFI INC.<sup>1</sup>, et al.,  
  
Debtors.

Chapter 11

Case No. 22-19361 (MBK)

BLOCKFI INC. AS THE WIND DOWN  
DEBTORS,

Plaintiff,

v.

(Jointly Administered under a  
Confirmed Plan)

Adv. Proc. No. 24-01067 (MBK)

ACE AMERICAN INSURANCE COMPANY,  
ARCH INSURANCE COMPANY, AXIS  
INSURANCE COMPANY, BERKLEY  
INSURANCE COMPANY, BERKSHIRE  
HATHAWAY SPECIALTY INSURANCE  
COMPANY, ENDURANCE AMERICAN  
SPECIALTY INSURANCE COMPANY,  
NATIONAL UNION FIRE INSURANCE  
COMPANY OF PITTSBURGH, PA, U.S.  
SPECIALTY INSURANCE COMPANY, XL  
SPECIALTY INSURANCE COMPANY,

Defendants.

**TO:** Clerk, United States Bankruptcy Court  
District of New Jersey  
Clarkson S. Fisher U.S. Courthouse  
402 East State Street,  
Trenton, New Jersey 08608

<sup>1</sup> The Wind-Down Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965); and BlockFi Lending II LLC (0154). The location of the Wind-Down Debtors' service address is c/o M3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

**DEFENDANT, ENDURANCE AMERICAN SPECIALTY  
INSURANCE COMPANY'S APPLICATION FOR ADMISSION PRO HAC  
VICE**

**PLEASE TAKE NOTICE** that on Thursday, March 14, 2024, at 9:00 a.m. or at such date and time as counsel may be heard, defendant, Endurance American Specialty Insurance Company (“Endurance”), by and through its attorney of record, Seth D. Griep, Esq., an attorney duly admitted to this Court, shall respectfully make application before the Honorable Michael B. Kaplan, U.S.B.J., at the United States Bankruptcy Court for the District of New Jersey, located at the Clarkson S. Fisher U.S. Courthouse 402 East State Street Trenton, New Jersey 08608, upon the accompanying Declarations of Seth D. Griep, Esq. and Kevin J. Windels, Esq. (and the Certificate of Good Standing annexed thereto), pursuant to Fed R. Civ. Proc. 78, D.N.J. L.Civ.R. 101.1(c), D.N.J. LBR 9010-1 and D.N.J. LBR 2090-1, for entry of an Order granting admission of Kevin J. Windels, Esq., a Partner of the firm Kaufman Dolowich, LLP, *pro hac vice* for purposes of appearing as co-counsel and representing Endurance in the above-captioned matter; and

**PLEASE TAKE FURTHER NOTICE** that in support of this application, Endurance will rely upon the accompanying Declarations of Seth D. Griep, Esq. and Kevin J. Windels, Esq. (and the Certificate of Good Standing annexed thereto), both of which are being electronically filed contemporaneously herewith; and

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order granting the relief requested is submitted herewith.

Dated: March 7, 2024

**Respectfully submitted,**

By: /s/ Seth D. Griep

Seth D. Griep

**Kaufman Dolowich, LLP**

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*Attorney for Defendant, Endurance  
American Specialty Insurance Company*